

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

MOTOROLA, INC.,

Plaintiff,

v.

LEMKO CORPORATION, XIAOHONG  
SHENG, SHAOWEI PAN, HANJUAN JIN,  
XIAOHUA WU, XUEFENG BAI,  
NICHOLAS LABUN, BOHDAN PYSKIR,  
HECHUN CAI, JINZHONG ZHANG,  
ANGEL FAVILA, ANKUR SAXENA,  
RAYMOND HOWELL, FAYE VORICK and  
NICHOLAS DESAI,

Defendants.

LEMKO CORPORATION, SHAOWEI PAN,  
XIAOHUA WU and XIAOHONG SHENG,

Counter-Plaintiffs,

v.

MOTOROLA, INC.,

Counter-Defendant.

Case No. 1:08-cv-05427

Judge Matthew F. Kennelly  
Magistrate-Judge Geraldine Soat Brown

**NOTICE OF UNOPPOSED MOTION**

PLEASE TAKE NOTICE THAT on Wednesday, August 17, 2011 at 9:30 a.m., Defendants Lemko Corporation, Shaowei Pan, Nicholas Labun, Bohdan Pyskir, Hechun Cai, Jinzhong Zhang, Faye Vorick, Xuefeng Bai, Nick Desai and Ankur Saxena shall appear, as necessary, before Judge Matthew F. Kennelly in courtroom 1003 and present their Unopposed Motion for Leave to File Previously Served Document, a copy of which is filed and served herewith.

Respectfully submitted,

/s/ Raymond P. Niro, Jr.

Raymond P. Niro

Raymond P. Niro, Jr.

Robert A. Conley

Brian E. Haan

Joseph A. Culig

NIRO, HALLER & NIRO

181 W. Madison, Suite 4600

Chicago, IL 60602

(312) 236-0733

Fax: (312) 236-3137

[RNiro@nshn.com](mailto:RNiro@nshn.com); [RNiroJr@nshn.com](mailto:RNiroJr@nshn.com);

[RConley@nshn.com](mailto:RConley@nshn.com); [BHann@nshn.com](mailto:BHann@nshn.com);

[JCulig@nshn.com](mailto:JCulig@nshn.com)

Attorneys for Lemko Corporation, Shaowei  
Pan, Xuefeng Bai, Nicholas Labun, Bohdan  
Pyskir, Hechun Cai, Jinzhong Zhang, Ankur  
Saxena, Faye Vorick and Nicholas Desai

## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on August 8, 2011 the foregoing

### **NOTICE OF UNOPPOSED MOTION**

was filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to the following counsel of record.

#### **Counsel for Motorola**

Dan K. Webb  
James E. McComb  
Joanna R. Travalini  
Lawrence R. Desideri  
Maureen L. Rurka  
WINSTON & STRAWN LLP  
35 West Wacker Drive  
Chicago, IL 60601-9703  
[dwebb@winston.com](mailto:dwebb@winston.com)  
[emccomb@winston.com](mailto:emccomb@winston.com)  
[jtravalini@winston.com](mailto:jtravalini@winston.com)  
[ldesideri@winston.com](mailto:ldesideri@winston.com)  
[mrurka@winston.com](mailto:mrurka@winston.com)

R. Mark Halligan  
Deanna R. Swits  
Jason T. Kunze  
Jodi R. Wine  
Michael C. Hallerud  
NIXON PEABODY LLP  
300 South Riverside Plaza, 16th Floor  
Chicago, IL 60606  
[rhalligan@nixonpeabody.com](mailto:rhalligan@nixonpeabody.com)  
[dswits@nixonpeabody.com](mailto:dswits@nixonpeabody.com)  
[jkunze@nixonpeabody.com](mailto:jkunze@nixonpeabody.com)  
[jwine@nixonpeabody.com](mailto:jwine@nixonpeabody.com)  
[hallerud@nixonpeabody.com](mailto:hallerud@nixonpeabody.com)

John A. Chatowski  
Robert A. Weikert  
NIXON PEABODY LLP  
One Embarcadero Center, 18th Floor  
San Francisco, CA 94111  
[jchatowski@nixonpeabody.com](mailto:jchatowski@nixonpeabody.com)  
[rweikert@nixonpeabody.com](mailto:rweikert@nixonpeabody.com)

#### **Counsel for Xiaohong Sheng**

Thomas Howard Geoghegan  
Michael Paul Persoon  
DESPRES SCHWARTZ & GEOGHEGAN  
77 West Washington Street - Suite 711  
Chicago IL 60602  
[admin@dsgchicago.com](mailto:admin@dsgchicago.com)  
[mike.persoon@gmail.com](mailto:mike.persoon@gmail.com)

#### **Counsel for Hanjuan Jin**

Telly Stefaneas  
TELLY STEFANEAS, ESQ.  
53 West Jackson Boulevard - Suite 1437  
Chicago, IL 60604  
[telly\\_stefaneas@me.com](mailto:telly_stefaneas@me.com)

#### **Counsel for Xiaohua Wu**

William J. Leonard  
WANG, LEONARD & CONDON  
33 North LaSalle Street - Suite 2020  
Chicago, IL 60602  
[williamjleonard@yahoo.com](mailto:williamjleonard@yahoo.com)

#### **Counsel for Angel Favila**

Gregory Adam Adamski  
ADAMSKI & CONTI  
100 North LaSalle Street - Suite 1720  
Chicago, IL 60602  
[GAAdamski@adamskiandconti.com](mailto:GAAdamski@adamskiandconti.com)

#### **Counsel for Raymond Howell**

Isabella I Wells  
LAW OFFICES OF ISABELLA I. WELLS, P.C.  
415 N. LaSalle - Suite 301  
Chicago, IL 60654  
[isabellawells@gmail.com](mailto:isabellawells@gmail.com)

I certify that all parties in this case are represented by counsel who are CM/ECF participants.

\_\_\_\_\_  
/s/ Raymond P. Niro, Jr.  
NIRO, HALLER & NIRO